

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Woodside Landfill & Recycling Center
Waste Management of Louisiana, LLC
Walker, Livingston Parish, Louisiana
Agency Interest Number: 11767
Activity Number: PER20070001
Proposed Permit Number: 1740-00025-V1**

I. APPLICANT

Company:
Waste Management of Louisiana, LLC
P.O. Box 99
Walker, Louisiana 70785

Facility:
Woodside Sanitary Landfill & Recycling Center
29340 Woodside Drive
Walker, Livingston Parish, Louisiana
Approximate UTM coordinates are 712.125 kilometers East and 3,374.883 kilometers North in Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

Woodside Landfill and Recycling Center (WLRC) is a municipal solid waste disposal facility with a design capacity of 41,410,552 cubic yards (approximately 31,600,609 cubic meters). It receives a variety of non-hazardous solid wastes (including municipal solid waste, such as residential and commercial solid waste, and industrial solid waste), which are disposed of by landfilling. Currently, the landfill is supported by a variety of operations and maintenance-related activities, including operation and maintenance of mobile equipment, non-mobile equipment powered by internal combustion engines, leachate handling, and the storage of motor fuels and lubricants. It is anticipated that the bioremediation of hydrocarbon-contaminated sludge and soils (non-hazardous) will take place at WLRC.

The most significant source of emissions at WLRC is landfill gas. A Gas Collection and Control System (GCCS) was installed in 2003 and is in operation. The GCCS consists of an "active" landfill gas extraction/collection system, which routes the collected gas to a control device (flare). The active gas collection system consists of extraction wells, which are operated under slight vacuum such that gas preferentially migrates to the wells. This prevents, to a large extent, landfill gas migrating to and emitting from the surface of the landfill. The collected landfill gas is then routed to and burned by a flare.

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WLRC has been in operation since 1987. The original Part 70 operating permit application for the referenced facility was submitted to LDEQ in October 1996. The application was revised on March 20, 2001. The initial Part 70 Operating Permit No. 1740-00025-V0 was issued for the facility on December 17, 2004. On August 22, 2007, the First Circuit Court of Appeal issued an opinion vacating the permit on the basis that the Pollution Control Project (PCP) exemption from PSD review for the Gas Collection and Control System at WLRC is not valid. An appeal of the First Circuit Court of Appeal's decision by the facility is pending.

This permit reevaluated emissions from the facility and determined all applicable requirements to the facility based on the Part 70 operating permit application submitted by the Waste Management of Louisiana, LLC.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire dated October 19, 2007, were submitted by Waste Management of Louisiana, LLC requesting a revision of Part 70 operating permit. Additional information dated December 7, 2007 was also received.

Project

No new project is proposed with this reopened permit. However, emissions from the previous projects (GCCS Construction Project and Landfill Expansion Project) have been reevaluated to determine applicability of various regulations.

Proposed Permit

Permit 1740-00025-V1 will be a reopened Part 70 operating permit for the Woodside Landfill & Recycling Center.

Permitted Air Emissions

Estimated emissions from the facility in tons per year are as follows:

Pollutant	Previous Estimate	Updated Emission Rate
PM ₁₀	27.90	16.91
SO ₂	12.18	10.31
NO _x	65.59	65.32
CO	621.06	237.73
VOC	37.89	34.27

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IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the permit.

Prevention of Significant Deterioration/Nonattainment Review

Due to the installation and operation of the gas collection and control system (GCCS), emissions of landfill gas (including VOC) were reduced while the emissions of PM₁₀, SO₂, NO_x, and CO have increased. The emissions from flaring gases collected by the GCCS have been recalculated using the emission factors provided by the flare vendor – LFG Specialties, LLC. Previously, the emissions were estimated using AP-42 factors for landfill flares. The updated emission estimations indicate that the facility-wide annual emission rate for each of PM₁₀, SO₂, NO_x, and CO is less than 250 tons per year. Since the landfill is not a stationary source of air pollutant listed in Table A of LAC 33:III.509, this facility is not a major PSD source and installation of the GCCS did not trigger PSD review.

It should be noted that NO_x emissions already requested in applications deemed administratively complete prior to December 20, 2001 are not subject to the Nonattainment New Source review per LAC 33:III.504.A.7. NO_x emissions from the flare has been addressed in the Part 70 operating permit application dated March 20, 2001, which deemed administratively complete prior to December 20, 2001. As compared to March 20, 2001 application, the estimated annual NO_x emission rate from the flare is increased from 27.90 tons/year to 38.32 tons/year. The increase is less than 25 tons per year. No other NO_x emission increase is proposed for the facility in this application.

Moreover, the Baton Rouge area was reclassified from a serious to a severe 1-hour ozone nonattainment area by operation of law on June 23, 2003 (68 FR 20077); and EPA's May 7, 2002, proposal to formally rescind the area's CAA Section 182(f) and 182(b)(1) NO_x exemptions was not effective until June 4, 2003 (68 FR 23597). Both events also occurred *after* the Authorization to Construct/Approval to Operate for the gas collection and control system was issued on May 2, 2003. Thus, installation of the GCCS shall not trigger Nonattainment Review.

MACT Requirements

This facility is subject to the federal MACT requirements of 40 CFR 63, Subpart AAAA and Subpart GGGGG (recordkeeping only) and state-only MACT requirement of LAC 33:III.5109.A. Detailed requirements are provided in the Specific Requirements section of the permit

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Air Quality Analysis

Air quality analysis was performed for CO using the AERMOD model and for 1,1,2,2-tetrachloroethane, acrylonitrile, and chlorobenzene using the ISCST3 model. The modeling results indicate that the concentration of CO in the ambient air meet the National Ambient Air Quality Standard and concentrations of above mentioned toxic air pollutants in the ambient air meet the Louisiana Toxic Air Pollutant Air Quality Standard.

General Condition XVII Activities

No General Condition XVII Activity is requested.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the permit.

V. PERMIT SHIELD

No permit shield is requested.

VI. PERIODIC MONITORING

All monitoring requirements necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Specific Requirements section of the permit.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated

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under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.